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December 6, 2022

**VIA EMAIL AND ECF**

Special Master Thomas P. Scrivo, Esq.  
O'Toole Scrivo, LLC  
14 Village Park Road  
Cedar Grove, New Jersey 07009  
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**RE: *Occidental Chemical Corp. v. 21st Century Fox America, Inc., et al.*  
Docket No. 2:18-cv-11273-MCA-LDW**

Dear Special Master Scrivo:

The SPG writes to request a short extension of time and enlargement of the page limit to respond to Plaintiff Occidental Chemical Corporation's ("OxyChem") Letter Motion for Protection from the SPG's Notice of Rule 30(b)(6) Deposition of OxyChem (ECF No. 2227) ("Letter Motion"). Given the scope and significance of the issues raised in OxyChem's Letter Motion, the intervening holidays, and the number of parties to coordinate with regarding a response, the SPG requests an extension until **January 6, 2023**, to respond to OxyChem's Letter Motion. Counsel for the SPG contacted counsel for OxyChem, who indicated that OxyChem consents to this request. In addition, the SPG requests a limit of **30 pages**, double-spaced, to respond to the Letter Motion. This is approximately commensurate with OxyChem's 14-page, single-spaced, Letter Motion, and is necessary to address and provide context for the numerous issues OxyChem raises

While OxyChem's Letter Motion addresses many of the topics in the SPG's notice of Rule 30(b)(6) deposition, there are others for which there is no dispute. In the interest of efficiency, the SPG reserves the right to depose OxyChem regarding notice topics not in dispute while OxyChem's motion for protective order is pending.

For these reasons, the SPG respectfully requests that the Special Master extend the deadline to respond to OxyChem's Letter Motion to January 6, 2023, and to enlarge the page-limit of the SPG's response to 30 pages.

Respectfully Submitted,



Jeffrey D. Talbert

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cc: All counsel of record